

**BEFORE THE JUDICIAL QUALIFICATIONS COMMISSION
STATE OF FLORIDA**

INQUIRY CONCERNING A JUDGE,]	
No. 03-78, DENNIS MALONEY]	Case No. SC04-22
_____]	

**JUDGE DENNIS MALONEY'S NOTICE
OF FILING ANSWERS TO INTERROGATORIES**

Judge Dennis Maloney, by and through his undersigned counsel, hereby files his attached answers to the Judicial Qualifications Commission's First Set of Interrogatories.

Certificate of Service

I hereby certify that the original of this Notice has been mailed to the Clerk of the Supreme Court, 500 South Duval Street, Tallahassee, FL 32399-1927, with copies to Hon. John P. Kuder, Chair, Judicial Qualifications Commission, Judicial Building, 190 Governmental Center, Pensacola, FL 32501; Thomas C. McDonald, Jr., Esq., 1904 Holly Lane, Tampa, FL 33629; Lansing C. Scriven, Esq., 442 W. Kennedy Blvd., Suite 280, Tampa, FL 33606; John Beranek, Esq., P.O. Box 391, Tallahassee, FL 32302; and to Brooke S. Kennerly, Executive Director, Judicial Qualifications Commission, 1110 Thomasville Rd., Tallahassee, FL 32303, on this ____ day of March, 2004.

GIBSON, VALENTI & ASHLEY

Robin Gibson, FBN 028594
212 E. Stuart Avenue
Lake Wales, FL 33853
863-676-8584 (o)

863-676-0548 (fax)

Attorney for Hon. Dennis P. Maloney

ANSWERS TO INTERROGATORIES

1. Do you intend to call any witnesses at the final hearing on the Notice of Formal Charges filed against you on or about January 15, 2004?

Answer: Yes.

2. If your answer to the preceding interrogatory is in the affirmative, please state for each such witness:

- a. The witness= name, address, and telephone number; and
- b. The facts to which the witness is expected to testify.

Answer:

Judge Charles B. Curry
P.O. Box 1749
Wauchula, FL 33873
863-773-6547

Judge Curry will provide factual testimony concerning Judge Maloney's knowledge of ' 316.193(9)(a) B (c), Fla. Stat. Judge Curry will also testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Judge Oliver L Green
415 Lake Miriam Drive
Lakeland, FL 33813
863-646-2344

Judge Green will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Jerry Hill, Esq.
State Attorney, Tenth Judicial Circuit
P.O. Box 9000 B Drawer SA
Bartow, FL 33831-9000
863-534-4800

Mr. Hill will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

J. Marion Moorman, Esq.
Public Defender, Tenth Judicial Circuit
P.O. Box 9000 B Drawer PD
Bartow, FL 33831-9000
863-534-4255

Mr. Moorman will testify will testify regarding Judge Maloney's character, reputation, and

integrity as a judge and as a member of the judicial system.

C. Geoff Vining, Esq.
P.O. Box 2525
Lakeland, FL 33806-2525
863-687-8320

Mr. Vining will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

John F. Wendel, Esq.
P.O. Box 5378
Lakeland, FL 33807-5378
863-646-5091

Mr. Wendel will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Clint Curtis, Esq.
P.O. Box 7608
Winter Haven, FL 33883
863-294-3360

Mr. Curtis will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

M. David Alexander, Esq.
P.O. Box 7608
Winter Haven, FL 33883
863-294-3360

Mr. Alexander will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Douglas Smith, Esq.
P.O. Box 1145
Lake Alfred, FL 33850-1145
863-956-2131

Mr. Smith will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Robert J. Antonello, Esq.
P.O. Box 9000
Bartow, FL 33831-9000
863-534-54800

Mr. Antonello will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Doug Jackson, Esq.
P.O. Box 783

Bartow, FL 33831-0783
863-519-0204

Mr. Jackson will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Robin Matis Jackson, Esq.
P.O. Box 783
Bartow, FL 33831-0783
863-519-0204

Ms. Jackson will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Ron N. Toward, Esq.
P.O. Box 1772
Bartow, FL 33831-1772
863-533-1232

Mr. Toward will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Robert G. Fegers, Esq.
P.O. Box 7692
Winter Haven, FL 33883-7692
863-294-2898

Mr. Fegers will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Wayne M. Durden, Esq.
State Attorney's Office
P.O. Box 9000
Bartow, FL 33831-9000
863-534-4800

Mr. Durden will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

John H. Shannon, Esq.
5300 S. Florida Avenue
Suite E-1
Lakeland, FL 33813-2519
863-619-7464

Mr. Shannon will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Peter E. Sternlicht, Esq.
State Attorney's Office
P.O. Box 9000
Bartow, FL 33831-9000
863-534-4800

Mr. Sternlicht will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Austin Maslanik, Esq.
Public Defender's Office
P.O. Box 9000
Bartow, FL 33831-9000
863-534-4254

Mr. Maslanik will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Richard D. Mars, Esq.
P.O. Box 1276
Bartow, FL 33831-1276
863-533-0855

Mr. Mars will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Tracie D. Spoto, Esq.
156 W. Christina Blvd.
Lakeland, FL 33813-3565
863-619-8980

Ms. Spoto will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Elizabeth Greer, Esq.
P.O. Box 9000
Bartow, FL 33831-9000
863-534-4925

Ms. Greer will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

John Liguori, Esq.
345 W. Davidson St.
Bartow, FL 33830-3765
863-533-6143

Mr. Liguori will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Shirley Olinger
P.O. Box 2003
Eagle Lake, FL 33839
863-298-8060

Ms. Olinger will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Kerry Wilson, Esq.
P.O. Box 7608
Winter Haven, FL 33883
863-294-3360

Mr. Wilson will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Jack P. Brandon, Esq.
130 E. Central Avenue
Lake Wales, FL 33853
863-676-7611

Mr. Brandon will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Robert A. Young, Esq.
212 E. Stuart Avenue
Lake Wales, FL 33853
863-676-8584

Mr. Young will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Steve D. Kackley, Esq.
357 S. Orange Street
Sebring, FL 33870-3738
863-385-5144

Mr. Kackley will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

Thomas A. McDonald, Esq.
2000 E. Edgewood Drive, Suite 107
Lakeland, FL 33803-3638
863-665-6895

Mr. McDonald will testify regarding Judge Maloney's character, reputation, and integrity as a judge and as a member of the judicial system.

R. James Platt, Jr., Esq.
P.O. Box 2536
Lakeland, FL 33806-2536
863-802-1732

Mr. Platt will testify regarding Judge Maloney=s character, reputation, and integrity as a judge and as a member of the judicial system.

Ted W. Weeks, III, Esq.
2000 S. Florida Avenue
Lakeland, FL 33803
863-686-2727

Mr. Weeks will testify regarding Judge Maloney=s character, reputation, and integrity as a judge and as a member of the judicial system.

Gregory M. Ruster, Esq.
1525 S. Florida Avenue
Lakeland, FL 33803-2294
863-682-0388

Mr. Ruster will testify regarding Judge Maloney=s character, reputation, and integrity as a judge and as a member of the judicial system.

Tony C. Dodds, Esq.
1628 S. Florida Avenue
Lakeland, FL 33803-2261
863-688-2389

Mr. Dodds will testify regarding Judge Maloney=s character, reputation, and integrity as a judge and as a member of the judicial system.

Ted W. Weeks, IV, Esq.
P.O. Box 3
Lakeland, FL 33802-0003
863-284-2200

Mr. Weeks will testify regarding Judge Maloney=s character, reputation, and integrity as a judge and as a member of the judicial system.

3. Do you intend to rely upon any documents at the final hearing on the Notice of Formal Charges filed against you on or about January 15, 2004?

Answer: Yes.

4. If your answer to the preceding interrogatory is in the affirmative, please identify those documents as that term is defined in the Definitions and Instructions sections of these interrogatories.

Answer:

- a. Complaint filed with the Judicial Qualifications Commission by Eugene V. Hannie.
- b. A partial list of complaints filed by Eugene V. Hannie that were subsequently dismissed in the Tenth Judicial Circuit.
- c. Copies of at least two orders dismissing lawsuits that were filed by Eugene V. Hannie in the Tenth Judicial Circuit.
- d. Copy of a Permanent Injunction by Judge Dennis Maloney against Eugene V. Hannie for filing numerous frivolous complaints in the Tenth Judicial Circuit.
- e. Collection of newspaper articles published in the Tenth Judicial Circuit during the course of Judge Maloney's judicial career for the purpose of demonstrating the public's exposure to 1) Judge Maloney's conduct in office that would bear on the issue of public confidence in the integrity and impartiality of the judiciary, 2) whether Judge Maloney's conduct in office would impair the confidence of the citizens of this state and the integrity of the judicial system, and the integrity of Judge Maloney as a judge, and 3) the extent to which the public has been exposed to any conduct on Judge Maloney's part that would be unbecoming to a member of the judiciary.
- f. Email dated January 10, 2003 from Lakeland Police Department staff person Faye Tarpley on behalf of Cliff Diamond to Charles Jacobson, III.

By: _____
Honorable Dennis Maloney

STATE OF FLORIDA
COUNTY OF POLK

The foregoing Honorable Dennis Maloney's Answers to Interrogatories were acknowledged before me this ____ day of March, 2004. He is personally known to me or has produced _____ as identification and did take an oath.

Notary Public, State of Florida

(SEAL)